

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

XEROX CORPORATION
Plaintiff

v.

PBOENLX COLOR CORPORATION

and

TECHNLGRAPHIX, INCORPORATED

Defendants

CIVIL ACTION NO. L 02 CV 1734

RESPONSE TO PHOENIX COLOR'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

FROM: XEROX CORPORATION

TO: PHOENIX COLOR CORPORATION

Documents To Be Produced

I. A copy of the employment or personnel file for Bruce Nussbaum.

Answer:

Will be produced.

2. A copy of all contracts or leases negotiated by Bruce Nussbaum.

Answer:

Object, Confidential, not relevant, overly broad and burdensome

3. All documents referencing payments made to Bruce Nussbaum related
to any purported contracts or leases with Technigraphix or Phoenix Color.

Answer:

No Record

14. A complete copy of the Xerox form #51858 ("Sale Maintenance Agreement") as used by Xerox in 1997, 1998, 1999 and 2000.

Answer:

Produced

15. A complete copy of the Xerox form #51860 ("Lease Agreement") as used by Xerox in 1997, 1998, 1999 and 2000.

Answer:

Form # 51860 for 10/1997, 10/1998, 10/1999 previously produced in response to the Technigraphics Discovery.

Produced #51860 02/2000

16. A complete copy of the Xerox form #51864 ("Addendum to Create a Separate Maintenance Agreement") as used by Xerox in 1997, 1998, 1999 and 2000.

Answer:

Produced Form # 51864-1 Addendum to Create a Separate Maintenance Agreement, Searched Archived records only had 1998 version on file.

17. All documents instructing Xerox employees, including, but not limited to, sales representatives, about the procedure for completing and obtaining approval for the form # 51858 ("Sale Maintenance Agreement"), #51860 ("Lease Agreement") and #51864 ("Addendum to Create a Separate Maintenance Agreement").

Answer:

Object to the broad and burdensome nature of the request and relevance to the instant action. Xerox's internal process of contract approval is not at issue where a signed contract is unambiguous and contains an integration clause. Notwithstanding this objection Plaintiff produces:

Produced specific pages of the USCO Contract Simplification Learner Guide for forms 51858, 51860, and 51864 Effective 1/97, how to guide on how to complete various Xerox Order Agreements.

Specific Business Policies and/or Credit Policies that were in effect outline the requirements for a sales order to be accepted by Xerox Corporation.

Rosalia Gianola, Legal Assistant
Xerox Capital Services, LLC

Sidney S. Friedman
Weinstock, Friedman & Friedman, P.A.
Attorneys for Plaintiff

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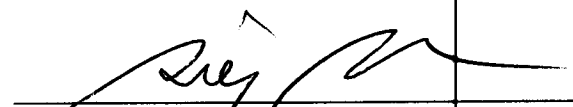
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of February, 2003, Xerox's Answers to Phoenix Color's First Set of Interrogatories and Responses to Phoenix Color's First Request for Production of Documents were hand delivered to: Robert A. Gaumont, Esquire, Piper Rudnick, 6225 Smith Avenue, Baltimore, MD 21209-3600

I will keep the original documents unaltered until after trial and the expiration of any appeal period.

WEINSTOCK, FRIEDMAN
& FRIEDMAN, P.A.



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